

Jonathan M. Jacobson  
WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
Telephone: 212-497-7758  
Facsimile: 212-999-5899  
jjacobson@wsgr.com

*Counsel for Defendant Hitachi Chemical Co. America, Ltd.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**IN RE CAPACITORS ANTITRUST  
LITIGATION**

**Master File No. 3:14-cv-03264-JD**

**THIS DOCUMENT RELATES TO:**  
**ALL INDIRECT PURCHASER  
ACTIONS**

**DEFENDANT HITACHI CHEMICAL  
CO. AMERICA, LTD.'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL HITACHI CHEMICAL  
CO. AMERICA, LTD.'S REPLY IN  
SUPPORT OF MOTION TO DISMISS  
THE INDIRECT PURCHASER  
PLAINTIFFS' SECOND  
CONSOLIDATED COMPLAINT**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Hitachi Chemical Co. America, Ltd. ("HCA") hereby moves the court to file under seal HCA's Reply in Support of Motion to Dismiss the Indirect Purchaser Plaintiffs' Second Consolidated Complaint ("IPP-SCC"). As explained in greater detail in the Declaration of Jeffrey C. Bank ("Bank Declaration"), filed herewith, HCA's motion quotes a redacted portion of "IPP-SCC" that remains filed under seal. *See* ECF No. 740.

A redacted version of HCA's Reply in Support of Motion to Dismiss has been electronically filed on the public docket. An unredacted version has been electronically submitted to the Court under seal pursuant to Civil Local Rule 79-5. HCA will serve both versions on Plaintiffs and all other Defendants.

1 For reasons described in the Bank Declaration, HCA takes no position on whether the  
2 redacted portion of IPP-SCC is sealable, but files this administration motion out of the  
3 abundance of caution and adherence to the Civil Local Rules.

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5 DATED: September 1, 2015

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

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7 By: s/ Jonathan M. Jacobson  
Jonathan M. Jacobson

8 Jonathan M. Jacobson  
9 Chul Pak (admitted *pro hac vice*)  
Jeffrey C. Bank (admitted *pro hac vice*)  
10 Justin A. Cohen (admitted *pro hac vice*)  
1301 Avenue of the Americas, 40th Floor  
11 New York, New York 10019  
Telephone: (212) 497-7758  
12 Facsimile: (212) 999-5899  
jjacobson@wsgr.com  
13 cpak@wsgr.com  
14 jbank@wsgr.com  
jcohen@wsgr.com

15 Jeff VanHooreweghe (admitted *pro hac vice*)  
16 1700 K Street, N.W., Fifth Floor  
Washington, DC 20006  
17 Telephone: (202) 973-8825  
18 Facsimile: (202) 973-8899  
jvanhooreweghe@wsgr.com

19 *Counsel for Defendant Hitachi Chemical Co.*  
20 *America, Ltd.*